

Bruce Halstead, US Fish & Wildlife Service
1125 16th Street, Room 209
Arcata, CA 95521
fax (707) 822-8411

Re: Elk River Timber Company in the DEIS/DEIR and
Permit numbers PRT-828950 and 1157.

And

John Munn
California Department of Forestry
1416 Ninth Street
Sacramento, CA 95814
fax (916) 653-8957

Re: SYP 96-002

Dear Directors:

These comments are specifically directed to elements of the Pacific Lumber HCP/SYP and the Headwaters Forest DEIS/EIR having to do with the South Fork of the Elk River (SFER) and Elk River Timber Company (ERTC) holdings involved with this process. My concerns are directed to the issue of reserve design identified by the Alternatives section of the DEIS/DEIR and the incongruity therein between the proposed Alternatives and the legislative mandate of the authorization language contained in the 1998 California legislation H.R. 1986. Alternatives proposed by the DEIS/DEIR do not reflect the alternatives prioritized by the state legislature in H.R. 1986 and therefor do not reflect proposed alternatives that were prioritized by our State representatives. Specifically, under SEC. 5 (a) the language states that the \$80 million allocated for the purchase of the Owl Creek Tract:

" To the extent funds allocated pursuant to this section remain after the purchase of the "Owl Creek" Tract, those funds may be reappropriated for the acquisition, at fair market value, of the tracts known as the "Elk River Property" and the previously unlogged ancient Douglas Fir forestland within the Mattole River watershed."

This language was included in the H.R. 1986 based on long standing community observations of the importance of the forest in the SFER precluded by the preliminary Agreement of September 28, 1996 and the responsiveness of State Senator Mike Thompson to concerns of his constituency regarding the need for reevaluation of the reserve design to protect the SFER watershed and to secure public ownership of a watershed based reserve. Local concerns around this issue in particular focus on the recognition of the values which are at stake in this very unique and sensitive watershed. The South Fork of the Elk River including the second growth forests of Elk River Timber Company is one of the most intact redwood watersheds in existence in the State of California.

According to the terms of the both the State and Federal appropriation language for the Headwaters Forest, the public will be purchasing all 15,000-acres most of which lies in the upper SFER. This provides the opportunity to protect at least one whole watershed in this taxpayer funded environmental protection effort. Please respond as to what was the criteria used to determine that the best design for the protection for the Headwaters Forest would be to leave a 1,000-acre in-holding in the publicly owned reserve? This question is especially pertinent when it is clear that some of the most intact forest habitat and viable buffer within the identified reserve lie in this proposed Palco in-holding. Similarly, important values associated with this proposed Palco in-holding include economic benefits for the developing visitation facilities for the city of Eureka and Humboldt County's growing tourist economy.

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I write these comments because I believe that if is not publicly acquired it will be an atrocity against the public and against public resources. The reserve design of the preferred Alternative #2 has remained static since they were first proposed in 1996 following the September agreement of that year. Other proposed Alternatives identify even less protection for the SFER and therefor are even less consistent to the stated goals of the DEIR/EIR to, " seek(s) to protect the largest blocks of the highest quality habitat for marbled murrelet and northern spotted owls, as well as stream habitat for fish and amphibians." The forest in the area I will refer to as the "Hole in the Headwaters" has been described as the first marbled murrelet habitat to come on line in the next century and in it's current condition already provides some of the best spotted owl habitat for a 30 mile radius. The South Fork of the Elk River contains fifth strongest population of Coho salmon n the State of California and pending timber operations (THP 1-97-520 Hum) in the "Hole in the Headwaters" area will have significant impacts to this important population. THP 520 (within the proposed reserve) alone encompasses 705-acres of the "Hole in the Headwaters" area and adjoins the Headwaters Forest Preserve acquisition boundary for more than 5 miles. The THP boundary comes 1/4 mile from the Headwaters Grove and parallels the South Fork of the Elk River for more than 2.5 miles. The 60 to 100 year old trees in this THP comprise some of the largest, oldest expanse of second growth forested wildlands in Humboldt County proximal to one of the largest stands of ancient redwood forest in the world

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The unique qualities of the South Fork of the Elk River are inadequately addressed in the plan. This logic expects the public to be ridiculously naive. The struggle for the ecological well being of this watershed has been particularly long standing and focused on its protection. \$380 million in public funds has been allocated for the acquisition and the entire 9,600 acres of Elk River Timber Company lands are included in this transaction. H.R. 1986 provided funding for the acquisition of the Palco in-holding and measures must be taken by the agencies to ensure the area is not degraded before appraisal process for this acquisition can be completed.

Significant public resource values were not evaluated during this preliminary design process and must be re-addressed during the approval process for the FEIS/EIR. It is the charge of the agencies evaluating resource protection measures of the \$480 million deal to provide subsequent feedback regarding the criteria used to develop the reserve design for the South Fork of the Elk River watershed and what changes must occur in this reserve design in order to maximize benefits for the public's investment.

I am sited as the author of the Recreation potion of the Headwaters Stewardship Plan. These are the draft prescriptions I developed for the plan (see enclosed). We did not include the whole text because we wanted to receive public comment on the plan before the final. The final will be out soon. More comments on this subject will be submitted on the 16th

(Draft)Public Access and Recreational Resources

In order to assess the effects of public ownership of the Headwaters Forest on regional economic and environmental conditions, it is essential to consider the value of recreational resources. This section is separated into two basic areas. The first is an overview and a functional assessment of the role managed recreational utilization of the Headwaters Forest will play in the local economy of Humboldt County. The second is an evaluation of the potential environmental impacts recreational use could create and an outline for an appropriately integrated land use design. .

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Current economic trends in the Humboldt County have gone in the direction of a flourishing service sector. There is a great need for long term "soft industry" alternatives to replace a natural resource based economy no longer capable of providing adequate employment for the burgeoning population. In fact, some of the soft industries to become successful in and around the Humboldt Bay area in recent decades include outdoor gear manufacturers such as Moonstone Equipment and Yakima Racks. County revenue generated from tourism now rivals those produced by timber, and will soon be the largest industry in county. Headwaters Grove lies a merely ten miles from the largest population center in the county, Eureka. Indeed many small and large businesses in and around this metropolis are certain profoundly benefit from the development of appropriate public access into the cathedral forests of the Headwaters area.

Herein also lies the problem. Industrial forms of ecotourism can sustain and even aggravate current adverse impacts left in the aftermath of poorly planned forestry operations.

The Headwaters Grove is one of the largest intact stands of ancient redwood forest on earth. At 3,000 acres the Headwaters Grove is also one of only old growth redwood stands to have not yet be compromised by the effects of mass human traffic. There are no freeways, no RV's, no parking lots carved out of the wilderness, no domesticated animals of any sort and there have been relatively few people to have ever traversed her delicate web of streams and ridges. It is for this reason that Wilderness designation for the grove area is the only alternative. In order to achieve a contiguous management area based upon the principles of conservation biology more road dependant human use activities including mountain biking and the facilities for large scale outdoor tours and education programs should be located in the surrounding 52,500 acres.

During the development of the Public Access and Recreation Plan for the wilderness area, several issues specific to recreation were identified. Some of these have also been identified within the over all stewardship plan and include prioritization of major restoration projects within the core watersheds. Recreational infrastructure planning measures constitute another layer of projects, which include but are not limited to, the development of:

- Circulation strategies
- Vehicular exclusion within buffer areas
- Visitor center location
- Trail systems design
- Camping and day use area planning
- Interpretive and educational programs

Circulation strategies

Some of the most difficult questions involved in the planning for recreational activity arise from circulation issues. Due to the rural character of surrounding neighborhoods, special attention must be given to the impacts of ingress and egress into the protected area. Although the residents in the vicinity are somewhat accustomed to lumber trucks rolling past their homes at all hours, the logistics behind individual automobile access into certain areas will be bound to cause unacceptable consternation. Considering the proximity of the forest to the urban area it has been proposed that a shuttle be used to convey visitors to the area. Shuttles have been employed in many other National Parks and have recently been proposed to alleviate congestion in Yosemite Valley. The shuttle would bring visitors from the existing Park and Ride located on Elk River road and U.S. Hwy 101 or some other chosen parking area, to the visitors center (approx. 7 miles). The shuttle system would reduce traffic and pollution problems while minimizing any potential conflicts with the surrounding community.

Vehicular exclusion within buffer areas

In order to protect the habitat and wilderness values of the grove, the 7,500 South Fork of the Elk River watershed and Salmon Creek will serve as the boundaries of the roadless area. Road closures within these watersheds will reduce the compounding negative effects and maintenance of an insensitively constructed timber harvesting road network. The intact second growth forest along the lower Little South Fork of the Elk is a large acreage and will provide an aesthetic environment for those individuals not comfortable making the 1.5 mile hike into the grove.

Visitor center location

The visitor center would be located along the South Fork of the Elk River road, downstream from the mouth of the Little South Fork of the Elk River confluence. The ruins of the early logging town of Faulk are an excellent location and there are many historic sites in the immediate area. These historic sites include

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a turn of the century train car turn around station in lower McWhitney Creek and across at least one ravine, there are 60' tall trestles. This area along the South Fork is relatively flat, is near the river and there are scattered residual old growth trees.

At some times of the year there are even hanging waterfalls which cascade more than ten feet into the river.

This area although within the Elk River Timber Company being traded by the government to Maxxam, is not covered by the existing "deal" and will need to be incorporated.

Since vehicular access will not be allowed beyond this point, the facilities should be sufficient to accommodate large numbers of visitors. The visitors center should be designed with the most minimal development necessary to promote visitor enjoyment and safety while providing for water quality and other biological resource protection. It is from the visitors center that all educational programs, day use activity and camping for the Headwaters Grove area should originate.

Trail system design

The proposed trail systems into the Headwaters Grove area are designed to provide for minimized negative effects upon the natural vegetative community, wildlife and water quality resources. The trail systems within the grove will be mainly for day use but a camping area will be made available near to the grove area for visitors interested in longer treks.

To minimize the effects of human caused erosion trails will be designed along the decommissioned roads where applicable. When trails must be developed through areas that are currently undeveloped they will be held away from watercourses and constructed in a way as to minimize soil disturbance and continuity of amphibian migration corridors.

The trail network shall originate from the visitors center. The main trail system and loop through the Headwaters grove will then proceed up the existing road and climb into the Little South Fork of the Elk River. Here a fork in the trail will begin the loop through the grove. The main fork will stay to the west of the watershed under the canopy of the 80 year old second growth forest which regenerated after the land was originally logged at the turn of the century. The trail will stay high until it reaches some of the most spectacular cathedral stands in the old growth grove. At this point, it will be important to direct the visitors up and away from the watercourse onto what is now known as "Bear Ridge." The trail will proceed along the ridge to join what known as the Pacific Lumber wildlife study trail. At this point, two options will be available to the hiker a return loop and a through trail to Fortuna. The return loop drops into the Little South Fork at the very end of the "Death Road" and descend upon an existing trail on the east side of the drainage and connect to a old road system. The other fork continues along "Bear Ridge" through the grove for 1 mile where it emerges from the forest. This trail can then drop down into Salmon Creek and be followed all of the way to Fortuna. Many variations along existing skid roads are also available for day use exploration.

A trail system, which could be available for access to Elk Head Springs Grove and the North Eastern side of Headwaters Grove leads from the visitors center along the South Fork of the Elk River (Falk Road) past the confluence of the Little South Fork of the Elk and across to the South side of the river and several miles to the East. This trail system will contour above the river and spend much time traversing in the aesthetic recovering second growth forests.

Camping and day use area design

Camping areas will be designed to provide facilities compatible with the primitive character of the area and will include sufficient safeguards against resource degradation. The presence of cooking facilities, large quantities of garbage and human waste is not compatible with the natural processes taking place within the grove itself. The species balance is too fragile to encourage the introduction of opportunistic and predatory species.

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Visitors will need to apply for day use and camping permits at the visitors center. It will be important to regulate what areas of the forest have visitors and how many visitors are in a particular area. Backcountry hikers can be directed to zones and camping areas to reduce the impacts of saturation.

The main camping areas developed for the Headwaters area must be established near the visitors center where their presence will not interfere with existing wildlife patterns or degrade water quality. The ghost town of Faulk has served as habitation large numbers of people historically and is the logical choice to take in the bulk visitors orienting to the conservation biology principles of park management.

Backcountry users will be required to camp in designated facilities that are outside or on the periphery of the grove. There are good locations for this in Salmon Creek, the previously Elk River Timber owned lands in the South Fork of the Elk and the west side Simpson Timber land. Garbage will be managed on a pack it in pack it out basis and human waste handled by septic systems and outhouse facilities.

Interpretive and Educational programs

Park visitors will need to be oriented to the special conditions of the Headwaters Wilderness area via the staff/visitor interactions, printed and posted information and educational programs. Visitors will be summarily instructed in the park's management principles of conservation biology, equipment needs and rules for day use and "no trace" camping. Ample opportunity will be provided along the trail system for the display of educational and interpretive information and a nature trail can be constructed in the vicinity of the visitor center.

Educational programs should include a history and a natural history of the watershed including the rise and fall of logging of the town of Falk. The history of this town and the South Fork of the Elk River watershed can be found in a publication by John Humboldt Gates "Faulk's Claim". Also included in the historical education can be the a display of the history of the struggle to protect Headwaters. Natural history programs will also be included as a forum for the integration of visitors.

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